

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-08-154

- - - - -X

UNITED STATES OF AMERICA

- against -

LEONID ARONOV,

Defendant.

AFFIDAVIT
IN SUPPORT OF
AN ARREST WARRANT

- - - - -X

JOHN J. McKEEVER, being duly sworn, deposes and says that he is a Special Agent of the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, there is probable cause to believe that on or about and between November 8, 2007 and November 13, 2007, both dates being approximate and inclusive, within the Eastern District of New York, the defendant LEONID ARONOV, did knowingly and intentionally receive and possess goods and chattels, which had been stolen, unlawfully taken and carried away from an airport, to wit: John F. Kennedy International Airport ("JFK") American Airline cargo facility, which is located within JFK Building 123, and were moving as and which were a part of a foreign shipment of freight and property, to wit: Nikon lenses and accessories.

(Title 18, United States Code, Sections 659, 2 and 3551
et seq.)

The source of your affiant's information and
the grounds for his believe is as follows:

2. I have been a Special Agent for the FBI for over
ten years and am currently the coordinator of a task force that
specializes in the investigation and prosecution of property
theft crime, particularly thefts from cargo and baggage at
airports in the New York City area, including at John F. Kennedy
International Airport ("JFK"). The facts set forth in this
affidavit are based in part on information that I have learned
from the review of written documents prepared by, and
conversations with, members of the FBI, Port Authority of New
York and New Jersey ("PAPD") and American Airlines, as well as
various law enforcement databases and information obtained
through grand jury subpoena. As this affidavit merely
establishes probable cause, it does not contain all of the facts
which I have learned through my investigation.

3. On or about December 11, 2007, an official of
America Airlines reported that on or about and between November
9, 2007 and November 13, 2007, a shipment containing the NIKON
EQUIPMENT was found missing from their cargo facility at JFK

("the Shipment"). They further reported that the Shipment had been off-loaded from an American Airlines flight which arrived at JFK from Zurich, Switzerland, on November 9, 2007 and that the Shipment belonged to B & H Photo ("B & H"), a photographic equipment business located in New York, New York. I interviewed a representative of B & H who was familiar with the Shipment (the "Representative") who advised me that B & H was the owner of the Shipment. The Representative provided a list, attached as Exhibit A, of the Nikon lenses and accessories and their unique serial numbers which were contained in the Shipment. The Representative also informed me that he had lost a similar shipment of Nikon lenses and accessories in June 2007 under the same circumstances wherein his shipment had arrived in the United States on an American Airlines flight from abroad and that a portion of it was found missing from the American Airlines cargo facility after its arrival (the "Prior Shipment"). The representative provided me with a list, attached as Exhibit B, of the Nikon lenses and accessories and their unique serial numbers which were contained in the Prior Shipment. The Nikon camera lenses and accessories contained in the Shipment and the Prior Shipment are collectively referred to as the "NIKON EQUIPMENT".

(American Airlines did not report the Prior Shipment theft to the PAPD).

4. The Representative was advised by a PAPD Detective to check EBAY as a possible place where he could locate the Shipment. EBAY is an Internet auction website wherein individual account holders can sell products through a bidding process orchestrated by EBAY. In or about early December 2007, The Representative reported to me that he observed numerous Nikon camera lenses and other equipment identical to that contained in the Shipment being sold on EBAY. In fact, The Representative stated that the product description used for each item on the EBAY website exactly matched that which appeared in the B & H catalogue for the same item. A representative of EBAY identified the account holder for the account which had listed the NIKON EQUIPMENT from the Shipment to be Leonid Aronov, 200 Winston Drive, Apartment 2611, Cliffside, New Jersey. Moreover I was advised that the cellular telephone number associated with that account was 201-280-3003 ("the EBAY account").

5. On December 15, 2007, posing as a civilian, I placed a bid on EBAY for one of the Nikon camera lenses which had been identified by The Representative. The Representative advised me that the lens on which I had bid, a Nikon AF-S VR Zoom

- Nikkor 24-120mm, f/ 3.5-5.6G IF-ED, had a wholesale value of \$420. The EBAY account was selling it for a starting bid of \$330. On December 16, 2007, I placed a second bid on EBAY for another camera lens which The Representative had identified. The Representative advised me that this second lens, a Nikon 2000m Zoom Telephoto AF VR Zoom 70-200mm f/2.8, had a wholesale value of \$1,350.00. The lens was selling on EBAY for a starting bid of \$1,150.00. I won the auction for the two lenses on which I had placed a bid.

6. On or about December 20, 2007, I received a package which had been shipped to an undercover address via the United States Postal Service ("USPS"). The package contained the two lenses which I had won in the EBAY auction. The return address label on the package stated the following:

LENNY
201-280-3003
WORLD OF LUXURY, INC.
2500 HAMILTON BLVD.
SOUTH PLAINFIELD, NJ 07080

7. I provided the serial numbers contained on the two lenses which I had obtained through the EBAY auction to The Representative who advised me that these two serial numbers matched those of two of the lenses which were contained in Shipment.

8. On January 23, 2008, I placed a bid on EBAY for a third Nikon camera lens which was identified by The Representative as being part of the Shipment. The Representative advised me that the lens on which I bid, a NIKON 35mm f/2D Autofocus NIKKOR lens, had a wholesale value of \$220.00. The EBAY account was selling it for a starting bid of \$230.00. On January 24, 2008, I placed a fourth bid on EBAY for one of the Nikon camera lenses which The Representative identified as having been part of the Prior Shipment. The Representative advised me that this fourth lens, a Nikon TC-17E II 1.7x teleconverter, had a wholesale value of \$268.00. The EBAY account was selling the lens for a starting bid of \$250.00. I won the auction for both of these lenses. On or about January 28, 2008, I received a package which had been shipped to an undercover address which contained the last two lenses that I purchased on EBAY. The package had a return address label identical to that of my last purchase, namely:

LENNY
201-280-3003
WORLD OF LUXURY, INC.
2500 HAMILTON BLVD.
SOUTH PLAINFIELD, NJ 07080

9. I transmitted payment for the first two lenses that

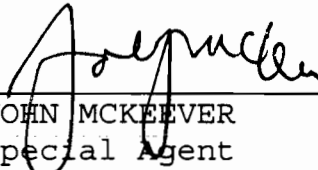
I bought to PAYPAL, which is an Internet service which facilitates the transfer of money from purchasers to sellers for EBAY transactions. I obtained PAYPAL records for the EBAY account to which my payment for the four lenses was forwarded. The PAYPAL records indicated that my money went into an account which was registered to the defendant LEONID ARONOV. There were three address listed for the account which included the SUBJECT PREMISES, 200 Winston Drive, Apt. 2611, Cliffside Park, New Jersey, and 2054 Charles Court, Mahwah, New Jersey. PAYPAL records also indicated that money in ARONOV account had been transferred to a Bank account at HSBC Bank. Records obtained pursuant to a grand jury from HSBC revealed that money from the PAYPAL account was deposited into an account in the name of World of Luxury, D/B/A Luxury Bazaar. The defendant LEONID ARONOV is listed on these HSBC records as the President of these companies.

10. In or about January 2008, a PAPD Detective contacted a Postal Inspector for the USPS. That Inspector reported to the Detective that an interview of the postal carrier who services the premises 2500 Hamilton Boulevard, South Plainfield, New Jersey revealed that mail for World of Luxury, Luxury Bazaar and LEONID ARONOV is delivered to the office of

Marvel Worldwide, which is located at 2500 Hamilton Boulevard,
South Plainfield, New Jersey.

WHEREFORE, IT IS HEREBY REQUESTED that an arrest
warrant be issued authorizing the arrest of the defendant LEONID
ARONOV so that he may be dealt with according to law.

Dated: February 13, 2008
Brooklyn, New Jersey



JOHN MCKEEVER
Special Agent
Federal Bureau of Investigation

Sworn to before me this
13th day of February 2008

JUDGE

CLERK